

UNITED STATES DISTRICT COURT

for the
Western District of Washington

FILED	LODGED
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Oct 29, 2020	
CLERK U.S. DISTRICT COURT WESTERN DISTRICT OF WASHINGTON AT TACOMA BY DEPUTY	

In the Matter of the Search of
*(Briefly describe the property to be searched
or identify the person by name and address)*
 1645 Joyce Piedmont Road, Port Angeles,
 Washington, and a white Chevrolet Silverado
)
)
)
)
)

Case No. MJ20-5248

APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (*identify the person or describe the property to be searched and give its location*):

See Attachment A, attached hereto and incorporated herein by reference.

located in the Western District of Washington, there is now concealed (*identify the person or describe the property to be seized*):

See Attachment B, attached hereto and incorporated herein by reference.

The basis for the search under Fed. R. Crim. P. 41(c) is (*check one or more*):

- evidence of a crime;
- contraband, fruits of crime, or other items illegally possessed;
- property designed for use, intended for use, or used in committing a crime;
- a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section

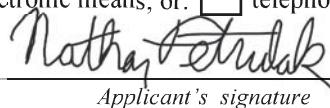
Offense Description

18 U.S.C. §§ 922(a)(6) and 2 Aiding and Abetting Making a False Statement in Connection with Acquisition of Firearm

The application is based on these facts:

- See Affidavit of Nathan Petrulak, attached hereto and incorporated herein by reference
- Delayed notice of _____ days (give exact ending date if more than 30 days: _____) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

Pursuant to Fed. R. Crim. P. 4.1, this warrant is presented: by reliable electronic means; or: telephonically recorded.


Applicant's signature

Nathan Petrulak, Special Agent, ATF

Printed name and title

- The foregoing affidavit was sworn to before me and signed in my presence, or
- The above-named agent provided a sworn statement attesting to the truth of the foregoing affidavit by telephone.

Date: 10/29/2020


Judge's signature

J. Richard Creatura, United States Magistrate Judge

Printed name and title

City and state: Tacoma, Washington

AFFIDAVIT OF NATHAN PETRULAK

STATE OF WASHINGTON)
)
COUNTY OF KING)

I, Nathan Petrulak, a Special Agent with the Bureau of Alcohol, Tobacco,
Firearms, and Explosives, Seattle, Washington, being first duly sworn, hereby depose and
state as follows:

INTRODUCTION

9 1. This Affidavit is being submitted pursuant to Federal Rule of Criminal
10 Procedure 41 in support of an Application for a warrant authorizing the search of the
11 following, which are more particularly described in Attachment A, which is incorporated
12 herein by reference:

a. a residence located at 1645 Joyce-Piedmont Road, Port Angeles, Washington, (hereinafter the SUBJECT LOCATION); and

b. a white 2015 Chevy Silverado, bearing Washington state license plate C10284R with VIN: GC4K0E81FF589043 (hereinafter the SUBJECT VEHICLE).

18 The evidence to be searched for and seized is more particularly described in Attachment
19 B, which is incorporated herein by reference.

20 2. Based on my training and experience and the facts as set forth in this
21 Affidavit, there is probable cause to believe that violations of Title 18, United States
22 Code, Sections 922(a)(6) and 2, *Aiding and Abetting Making a False Statement in*
23 *Connection with the Acquisition of a Firearm*, and Title 18, United States Code, Sections
24 922(g)(1), *Felon in Possession of a Firearm*, have been committed and are being
25 committed by HUNTER CHRISTOPHER BURROWS. There is also probable cause to
26 believe that the SUBJECT LOCATION and SUBJECT VEHICLE described above
27 contains evidence of the aforementioned offenses. As such, there is probable cause to
28 search the SUBJECT LOCATION and SUBJECT VEHICLE described in Attachment A,

1 for evidence, instrumentalities, or contraband of these crimes, as well as HUNTER
 2 CHRISTOPHER BURROWS himself, as described in Attachment B. Obtaining the
 3 information sought in this Affidavit is necessary to further the investigation into these
 4 offenses.

5 **AGENT BACKGROUND**

6 3. I am a Special Agent (SA) with the Bureau of Alcohol, Tobacco, Firearms,
 7 and Explosives (ATF) and have been so employed since March 6, 2018. I am an
 8 “investigative or law enforcement officer of the United States” within the meaning of
 9 Title 18, United States Code, Section 2510(7), that is, an officer of the United States
 10 who is empowered by law to conduct investigations of, and to make arrests for, offenses
 11 enumerated in Title 18, United States Code, Section 2516. I am currently assigned to the
 12 Seattle Field Division in Seattle, Washington where I am assigned to the Seattle I Field
 13 Office.

14 4. I received formal training in the Federal Law Enforcement Training Center
 15 in Glynco, Georgia, Criminal Investigators Training Program, which familiarized me
 16 with basic narcotic investigations, drug identification and detection, familiarization with
 17 United States narcotics laws, financial investigations and money laundering,
 18 identification and seizure of drug-related assets, organized crime investigations, physical
 19 and electronic surveillance, and undercover operations. In addition, I successfully
 20 completed a fifteen-week ATF Special Agent Basic Training course in Glynco, Georgia,
 21 which included comprehensive, formalized instruction in, among other things: firearms
 22 identification, firearms trafficking, arson and explosives, and tobacco and alcohol
 23 diversion. I am graduate of Point Park University where I received a Master’s in Business
 24 Administration in 2014. Additionally, I am a graduate of the University of Pittsburgh
 25 where I received a Bachelor of Science in Biological Sciences in 2010. As a result of my
 26 training, experience, and that of other more experienced investigators, I have an
 27 understanding of the manner in which narcotics are distributed and various roles played
 28

by individuals or groups involved in the distribution, along with unlawful use of firearms during crimes of violence and/or drug trafficking and firearms trafficking.

3 5. The facts set forth in this Affidavit are based on my own personal
4 knowledge; knowledge obtained from other individuals who participated in this
5 investigation, including other law enforcement officers; my review of documents and
6 records related to this investigation; and information gained through my training and
7 experience. Because this Affidavit is submitted for the limited purpose of establishing
8 probable cause in support of the Application for a search warrant, it does not set forth
9 each and every fact that I or others have learned during the course of this investigation,
10 but only those facts necessary to set forth probable cause in support of this Application.

APPLICABLE LAW

12 6. Title 18, United States Code, Section 922(a)(6) provides for criminal
13 penalties for knowingly making a false and fictitious statement in connection with the
14 acquisition of a firearm from a federally licensed firearms dealer that is intended and
15 likely to deceive such dealer with respect to a fact material to the lawfulness of the sale of
16 such firearm. Title 18, United States Code, Section 2, provides for criminal penalties for
17 those who aid and abet those acts. Title 18, United States Code, Sections 922(g)(1) and
18 (8) provide for criminal penalties for a person who knowingly possesses a firearm that
19 has moved in interstate or foreign commerce after knowingly having been convicted of a
20 crime punishable by more than a year in prison, or is subject to a court order protecting
21 an intimate partner from harassment.

KNOWLEDGE BASED ON TRAINING AND EXPERIENCE

23 7. Based upon my training and experience, including my experience in other
24 firearms investigations, and my discussions with other experienced officers and agents
25 involved in firearms investigations, I know that gun owners, especially individuals who
26 possess or own multiple firearms and/or a gun safe, often keep firearms for a lengthy
27 period of time—years and even decades. I also know that individuals who possess guns
28 also often have gun accessories, including but not limited to ammunition, scopes,

1 holsters, cases, cleaning kits, and safes in which to store firearms. I am aware that, when
 2 someone makes a purchase of a firearm from a federally licensed firearms dealer, he will
 3 be provided with a receipt and other paperwork with respect to the sale, such as owner's
 4 manuals, warranty/manufacturer information, and safety brochures, and I know that
 5 individuals who purchase guns in this manner often retain such documentation. I also
 6 know that firearms can be purchased over the internet, both from legitimate gun brokers
 7 and from other sources. Internet-enabled cell phones (i.e., "smart phones") and other
 8 digital devices like computers may be used to facilitate such purchases. Those digital
 9 devices may contain evidence of those purchases, including but not limited to photos of
 10 firearms; texts and/or emails discussing purchases; emails showing receipts of
 11 transactions; and caches of internet sites that the device's user visited to look for and
 12 purchase firearms. I also know that when a purchase is made over the internet and the
 13 item is shipped to the purchaser, the items often arrive with envelopes, invoices, receipts,
 14 packaging, owner's manuals, and assembly instructions. Finally, I know that people tend
 15 to retain records or receipts for expensive or notable purchases, including firearms, for
 16 several years after the purchase. One of the reasons people retain these records is to use
 17 for filing a police report or insurance claim if the firearm is lost or stolen.

STATEMENT OF PROBABLE CAUSE

Background

20 8. Julian Hedin owns a business called Better Pawn in Port Angeles,
 21 Washington. That store sells firearms, and has a federal firearms license to do so, issued
 22 under the license name "Better Pawn: A White Trash Fabrication Company LLC," and
 23 trade name "Better Pawn."

24 9. Gunbroker.com is an online retailer that operates similar to EBay. Sellers
 25 of firearms and related items (ammunition, gun cleaning kits, etc.) can post items that
 26 they are offering for sale onto Gunbroker.com's website. Potential buyers then bid on
 27 those items over a set period, or buy them outright. Due to firearms regulations, sellers
 28 may then send the purchased firearm to a federally licensed firearm dealer convenient to

the purchaser. That federally licensed firearms dealer can then have the purchaser complete the necessary paperwork to effect a lawful transfer of the firearm to the purchaser.

Attempted Purchase of Semiautomatic Rifle

5 10. According to its records, on or about May 11, 2020, Gunbroker.com
6 processed a purchase of an FNH Scar 17S FDE NIB .308 rifle on its website. The seller
7 of the firearm was Nesbit Guns in Newcastle, Pennsylvania. The purchase price was
8 \$3,294.97. The listed buyer of the firearm was the Gunbroker.com user name
9 "Halibutking 1." The transaction was to be billed to Allie Johnson at an address on
10 Reddick Road in Port Angeles, Washington, with a phone number of (360) 460-5863 and
11 an email address of hunterburrowsnw@gmail.com. The purchaser directed that the
12 firearm be shipped to Better Pawn in Port Angeles, Washington, for pick up.

13 11. Hedin reported that, after he received the invoice and rifle at Better Pawn,
14 HUNTER CHRISTOPHER BURROWS called the shop perhaps a half-dozen times to
15 discuss the purchase of the rifle. HUNTER CHRISTOPHER BURROWS told Hedin that
16 his “wife” was going to do the paperwork to purchase the rifle, and that it would be her
17 rifle.

18 12. Hedin explained that, on June 3, 2020, at about 2:00 or 2:30 p.m.,
19 HUNTER CHRISTOPHER BURROWS came to Better Pawn. Allie Johnson arrived at
20 the pawn shop at about the same time in a separate vehicle. They came into the store
21 together to pick up the rifle, and indicated that they were a married couple. HUNTER
22 CHRISTOPHER BURROWS asked questions about certain firearms in the store and
23 looked at some of the firearms on display. Allie Johnson did not seem to know anything
24 about firearms, like correct terminology.

25 13. Hedin was suspicious that the purchase was a straw purchase, i.e. that Allie
26 Johnson was not the true purchaser and was illegally purchasing the firearm for
27 HUNTER CHRISTOPHER BURROWS. He asked HUNTER CHRISTOPHER

1 BURROWS and Allie Johnson a number of questions to probe that issue and put them on
 2 notice that he was concerned that it was a straw purchase.

3 14. Hedin reported that Allie Johnson completed a Washington State Firearm
 4 Transfer Application and an ATF Firearms Transaction Record (Form 4473) to acquire
 5 the FNH Scar 17S FDE NIB .308 rifle. On the state application, Allie Johnson answered
 6 question 3 in Section C “If purchasing a semiautomatic rifle, do you certify you have
 7 completed the required safety training within the past 5 years” by checking the box
 8 “Yes.” She then signed that form under penalty of perjury. On the ATF Form 4473, Allie
 9 Johnson answered question 11.a “Are you the actual transferee/buyer of the firearm(s)
 10 listed on this form?” by checking the box “Yes.” The Form 4473 warned her that
 11 answering “yes” to question 11.a if she were not the actual transferee or buyer was a
 12 felony, and that answering any of the questions falsely was also a felony. Allie Johnson
 13 then signed the ATF Form 4473 certifying that her answers were true, correct, and
 14 complete.

15 15. According to Hedin, although the rifle had already been paid for via
 16 Gunbroker.com, the taxes and fees had not been paid. HUNTER CHRISTOPHER
 17 BURROWS took out his wallet and paid for the taxes and fees with cash. Hedin provided
 18 a receipt to Allie Johnson.

19 16. HUNTER CHRISTOPHER BURROWS and Allie Johnson then left Better
 20 Pawn. Allie Johnson’s background check had not been completed yet, so they did not
 21 take the firearm with them. Hedin could hear Allie Johnson and HUNTER
 22 CHRISTOPHER BURROWS while they were outside, before they drove away.
 23 HUNTER CHRISTOPHER BURROWS told Allie Johnson to call him right away once
 24 she was approved so that he could come pick up the rifle. Allie Johnson said something
 25 to the effect that she wanted HUNTER CHRISTOPHER BURROWS to stop and not get
 26 her into any further trouble.

27 17. The next day, Hedin was contacted by an individual who identified himself
 28 as a relative of Allie Johnson. That person was a long-time customer of Hedin. The

1 relative explained that HUNTER CHRISTOPHER BURROWS was pressuring or
2 coercing Allie Johnson into buying the FNH Scar rifle for HUNTER CHRISTOPHER
3 BURROWS, and that she was afraid of him. The relative was concerned for Allie
4 Johnson's safety. He said that Allie Johnson and he wanted Hedin to deny the purchase
5 so that HUNTER CHRISTOPHER BURROWS would not get the rifle and would not
6 know that it was because of Allie Johnson's actions that he could not have the firearm.

Investigation into Aiding and Abetting

Making a False Statement in Connection with the Acquisition of a Firearm

9 18. After receiving the information from Allie Johnson's relative, Hedin
10 contacted local police and ATF to advise that he believed that Allie Johnson and
11 HUNTER CHRISTOPHER BURROWS were engaged in a straw purchase, in which
12 Allie Johnson was buying a firearm for HUNTER CHRISTOPHER BURROWS at his
13 behest. He provided a written statement reporting what had occurred, as described above.

14 19. ATF Special Agents Angelo Salcepuedes and Elliott Prose met with and
15 interviewed Hedin. Hedin reported the information described above, and identified Allie
16 Johnson's relative who had reported the straw purchase to him. Agents Salcepuedes and
17 Prose showed Hedin photographs of HUNTER CHRISTOPHER BURROWS and Allie
18 Johnson, and he identified both of them as the people who were in his store to buy the
19 FNH Scar file on June 3, 2020. Hedin also provided Agents Salcepuedes and Prose with
20 video of the June 3, 2020, transaction from his in-store surveillance cameras. The video
21 clearly depicts HUNTER CHRISTOPHER BURROWS and Allie Johnson in the store
22 and interacting with Hedin, including showing HUNTER CHRISTOPHER BURROWS
23 reaching into his wallet, pulling out cash, and providing that cash to Hedin for the taxes
24 and fees. Finally, Hedin provided Agents Salcepuedes and Prose with copies of the forms
25 that Allie Johnson completed and the Gunbroker.com/Nesbit Guns invoice for the
26 purchase of the FNH Scar rifle.

27 20. On June 10, 2020, Agent Salcepuedes contacted Allie Johnson by telephone
28 to conduct an interview. Allie Johnson was willing to speak with him, and provided a

1 recorded statement. She said that she had met HUNTER CHRISTOPHER BURROWS in
 2 September 2019, and they had dated for a few weeks. Allie Johnson reported that
 3 HUNTER CHRISTOPHER BURROWS told her he saw a gun that he wanted and asked
 4 her to get it for him. HUNTER CHRISTOPHER BURROWS explained to her how the
 5 purchase would occur. HUNTER CHRISTOPHER BURROWS then transferred
 6 thousands of dollars from his Chase bank account into Allie Johnson's Chase bank
 7 account so she could make the purchase. HUNTER CHRISTOPHER BURROWS also
 8 took an online test for her so that Allie Johnson could be certified to have the type of gun
 9 he wanted.

10 21. Allie Johnson said HUNTER CHRISTOPHER BURROWS first tried to
 11 purchase the gun he wanted from Palmetto Armory, but was unsuccessful. Later, he was
 12 able to purchase the firearm through a different channel. Once the firearm was received
 13 by Better Pawn, Allie Johnson kept trying to put off going to the store to pick up the
 14 firearm. She eventually went and met HUNTER CHRISTOPHER BURROWS there.
 15 HUNTER CHRISTOPHER BURROWS had told her to try to act as if she knew about
 16 firearms or was interested in them. However, at the pawnshop, the person helping them
 17 was obviously aware of what was happening because he kept asking questions and
 18 talking about "red flags." While she was completing the paperwork, HUNTER
 19 CHRISTOPHER BURROWS pulled out his wallet and removed cash to pay for the taxes
 20 for the firearm.

21 22. Allie Johnson explained that she did what HUNTER CHRISTOPHER
 22 BURROWS asked because she was afraid of him. She described HUNTER
 23 CHRISTOPHER BURROWS as manipulative, and said that he had threatened to have
 24 CPS take her children away.

25 23. After she had completed the paperwork at Better Pawn to purchase the
 26 firearm, she talked to a relative who knew the owner of the pawnshop. She said her
 27 relative asked the owner if there was a way to deny the purchase so it would not look like
 28

1 Allie Johnson had not cooperated with the purchase. She wanted a text that she could
 2 show to HUNTER CHRISTOPHER BURROWS so that he would leave her alone.

3 24. Agents looked at text messages on Allie Johnson's phone that were sent to
 4 her by HUNTER CHRISTOPHER BURROWS. When the Palmetto Armory purchase
 5 was denied, he told her "you're going to be really ducked [sic] because I'm getting a
 6 refund and they are going to send that back but only credit a portion . . . Enjoy what's
 7 gonna happen this is it I promise . . . I'm going to dispute in 15 minutes they credit me
 8 the money out of your bank and when u send it back they only credit 75 [per]cent so
 9 that's going to screw you I spent 2000 for stuff on a gun . . . I'm logging on my bank so
 10 it's going to pull 4200 out of your account immediately and this is all your problem to
 11 figure out . . . I'm going to pay u back like u won't believe this is just the start." He then
 12 said he was going to cause her bank account to be overdrawn by \$4,200.

13 25. When HUNTER CHRISTOPHER BURROWS sensed that Allie Johnson
 14 was stalling in meeting with him to pick up the firearm, he told her, in part, "It would be
 15 in your best interest to just keep your word and go out [sic] separate ways. Otherwise it
 16 will be ugly." He complained that the gun had "been sitting there for 2 weeks" and
 17 expressed frustration with her excuses not to meet him. He told her that if she didn't meet
 18 him at the pawn store the next day, "I will do what I need to obviously . . . Have fun with
 19 cps etc. I've hit [sic] some great pictures of u." When she retorted she had photos of him
 20 too, HUNTER CHRISTOPHER BURROWS replied, "Cool I don't care I don't have kids
 21 u do but won't soon."

22 26. I have reviewed records from Palmetto Armory that show that on or about
 23 April 30, 2020, a person identifying themselves as Allie Johnson tried to purchase via the
 24 internet a FNH FN Scar 7.62 semi-automatic rifle to be shipped to a pawn store in Port
 25 Angeles for pick up. The price of the rifle was \$3,162.99, and the total invoice was for
 26 \$3,804.71. The transaction was declined.

27 27. I have also reviewed records from Chase relating to Allie Johnson's bank
 28 account there. Those records show that, on April 29, 2020, a cash deposit was made into

1 the account at an ATM in the amount of \$2,160.00, bringing the total balance in the
2 account from \$4.64 to \$2,164.64. On the same day, a payment was made into Allie
3 Johnson’s account from Zelle, an online payment service, from “Hunter Burrows” in the
4 amount of \$2,000. A few days later, the Palmetto Armory charge of \$3,804.71 was
5 debited from Allie Johnson’s account. On May 11, 2020, that debit was reversed.¹ The
6 account records also show that, on May 11, 2020, Allie Johnson made three payments via
7 Zelle from her account to “Hunter,” totaling \$430.00. On May 12, 2020, \$3,294.97 was
8 debited from the account, paid to “Nesbit Guns” via a card purchase. Another \$200 was
9 transferred to “Hunter” via Zelle the same day.

10 28. I have also reviewed records from Verizon, a phone company. Those
11 records show that the phone number (360) 460-5863, which is the phone number
12 associated with the Nesbit Guns purchase, has been subscribed to HUNTER
13 CHRISTOPHER BURROWS since at least January 2019.

14 29. Contemporaneously with this Application for a search warrant, I am
15 submitting to the Court a Complaint charging HUNTER CHRISTOPHER BURROWS
16 with one count of *Aiding and Abetting Making a False Statement in Connection with the*
17 *Acquisition of a Firearm*, and requesting that the court issue a warrant for the arrest of
18 HUNTER CHRISTOPHER BURROWS.

HUNTER CHRISTOPHER BURROWS's Status as a Prohibited Person

20 30. I have reviewed records relating to HUNTER CHRISTOPHER
21 BURROWS's criminal history. Those records show that HUNTER CHRISTOPHER
22 BURROWS has a Washington State conviction for *Vehicular Homicide*, a felony. RCW
23 46.61.520. This conviction prevents HUNTER CHRISTOPHER BURROWS from
24 lawfully possessing a firearm under Washington State law. RCW 9.41.040(1)(a),
25 (2)(a)(i); RCW 9.41.010(27). It appears that this offense is punishable by more than one

²⁸ ||¹ The credit to the account from Palmetto Armory was actually made twice. That double credit was corrected on May 26, 2020.

1 year in prison. The statutory maximum sentence for this crime is life in prison. RCW
 2 46.61.520. HUNTER CHRISTOPHER BURROWS was prosecuted for this offense as a
 3 juvenile, and as such, the court could have imposed more than one year in prison for this
 4 offense.

5 31. Additionally, I have reviewed documents from Clallam County Superior
 6 Court case number 19-2-00961-05 relating to an application for a protective order made
 7 by Lesly Burrows, HUNTER CHRISTOPHER BURROWS's wife. According to those
 8 records, Lesly Burrows applied for a protective order on or about November 17, 2019, to
 9 prevent HUNTER CHRISTOPHER BURROWS from contacting, harassing, stalking, or
 10 threatening her. At the same time, she asked the court for an order requiring HUNTER
 11 CHRISTOPHER BURROWS to surrender all firearms.

12 32. On or about December 20, 2019, the Clallam County Superior Court
 13 entered a Protection Order. The Protection Order complied in all respects with the
 14 requirements of Title 18, United States Code, Section 922(g)(8)(A)-(C). In particular, the
 15 court found that the respondent, HUNTER CHRISTOPHER BURROWS, had been
 16 personally served with notice of the hearing; had actual notice of the hearing; and in fact
 17 attended the hearing to address the issuance of the protective order. The court found that
 18 the petitioner, Lesly Burrows, was a spouse or former spouse of HUNTER
 19 CHRISTOPHER BURROWS (i.e., an "intimate partner"), and found that HUNTER
 20 CHRISTOPHER BURROWS represents a credible threat to the physical safety of the
 21 protected persons, Lesly Burrows and her son. The order restrained HUNTER
 22 CHRISTOPHER BURROWS from causing physical harm, bodily injury, assault,
 23 including sexual assault, and from molesting, harassing, threatening, or stalking Lesly
 24 Burrows or her son. Finally, the order informed HUNTER CHRISTOPHER BURROWS
 25 that he must not possess any firearms, and that possession of firearms or ammunition is a
 26 violation of federal law for which he could be punished by up to ten years in prison and a
 27 \$250,000 fine. The Protective Order provides that it is effective immediately and for a
 28 period of one year.

1 ***Probable Cause That HUNTER CHRISTOPHER BURROWS***

2 ***Possesses Firearms and/or Ammunition***

3 33. In the petition for a protective order filed by Lesly Burrows in November
 4 2019, she described approximately twelve firearms in HUNTER CHRISTOPHER
 5 BURROWS's possession, and reported that they were maintained in his residence in a
 6 safe in the master bedroom. These firearms included several handguns and rifles, at least
 7 two of which (an SKS and an AK-47) commonly use 7.62 ammunition, the type
 8 HUNTER CHRISTOPHER BURROWS purchased from Palmetto Armory.

9 34. During my investigation into the offense of *Aiding and Abetting Making a*
 10 *False Statement in Connection with the Acquisition of a Firearm*, discussed above, I
 11 reviewed police reports provided by the Clallam County Sheriff's Office with respect to
 12 HUNTER CHRISTOPHER BURROWS. One of those reports, from April 15, 2020,
 13 documents a police response to HUNTER CHRISTOPHER BURROWS's residence at
 14 1645 Joyce-Piedmont Road, Port Angeles, Washington. On that date, Clallam County
 15 Sheriff's Office deputies went to that residence in response to a call from Lesly Burrows,
 16 from whom he is separated. Lesly Burrows asked for a welfare check on HUNTER
 17 CHRISTOPHER BURROWS because she was concerned that he was suicidal, based on
 18 recent text messages and phone calls between them despite the protective order. (Lesly
 19 Burrows reported that she was not afraid at that time for her own safety, only for his.)
 20 When police went to 1645 Joyce-Piedmont Road, Port Angeles, Washington, they were
 21 unable to get HUNTER CHRISTOPHER BURROWS to come to the door even though
 22 his car was in the driveway. He also did not answer his phone; the outgoing voicemail
 23 message identified the phone as used by HUNTER CHRISTOPHER BURROWS. The
 24 deputies then called Lesly Burrows for additional information, including whether there
 25 were firearms in the house. Lesly Burrows told the deputies that there were several
 26 firearms in the upstairs bedroom.

27 35. As part of my investigation into the offense of *Aiding and Abetting Making*
 28 *a False Statement in Connection with the Acquisition of a Firearm*, I reviewed records

1 provided by Palmetto Armory. In addition to reflecting Allie Johnson's attempted
 2 purchase of a firearm in April, those records also show that on May 8, 2020, a person
 3 identifying himself as "Hunter Burrows" with a phone number of (360) 460-5863 and an
 4 email address of hunterburrowsnw@gmail.com ordered 500 rounds of 7.62 ammunition.
 5 The order directed the ammunition to be shipped to 1645 Joyce Piedmont Rx [sic] in Port
 6 Angeles, Washington. The records reflect that that ammunition was shipped the next day
 7 as ordered, and included a UPS tracking number.

8 36. In September 2020, I interviewed Allie Johnson regarding her knowledge
 9 of HUNTER CHRISTOPHER BURROWS's possession of firearms and ammunition.
 10 Allie Johnson reported that she knows that HUNTER CHRISTOPHER BURROWS
 11 keeps guns and has seen those firearms in his home and with him in his car. Specifically,
 12 she said that HUNTER CHRISTOPHER BURROWS normally carries a handgun on his
 13 person, which she believes may be a 40 caliber. She said that when he is driving his
 14 truck, HUNTER CHRISTOPHER BURROWS kept that gun in the center console of the
 15 vehicle. At his home, she would see firearms behind the couch cushions, on top of the
 16 refrigerator, openly on the kitchen counter, or on a shelf near the rear sliding glass door.
 17 Allie Johnson also said she that HUNTER CHRISTOPHER BURROWS had a gun safe
 18 in the upstairs bedroom where he keeps most of his guns. She has seen HUNTER
 19 CHRISTOPHER BURROWS access the guns in that safe, and that there were
 20 approximately seven or eight guns inside. She described the firearms as a mix of
 21 handguns and rifles. Allie Johnson said she understood that some of the firearms
 22 belonged to HUNTER CHRISTOPHER BURROWS's wife/ex-wife, and some belonged
 23 to HUNTER CHRISTOPHER BURROWS's father. Allie Johnson also reported she had
 24 seen HUNTER CHRISTOPHER BURROWS fire the rifles off of his back porch into the
 25 woods. The last time that Allie Johnson was at HUNTER CHRISTOPHER BURROWS's
 26 residence was about four to six months before the September interview, but that she
 27 continues to communicate periodically with HUNTER CHRISTOPHER BURROWS.
 28

1 Allie Johnson expressed fear of retaliation from HUNTER CHRISTOPHER BURROWS
 2 if he finds out that she talked to the police about him.

3 37. I conducted a records check on HUNTER CHRISTOPHER BURROWS. It
 4 shows that he is the owner of a 2015 Chevrolet Silverado, the SUBJECT VEHICLE, that
 5 is registered to him at 1645 Joyce Piedmont Road, Port Angeles, Washington, the
 6 SUBJECT LOCATION. He has had a number of other vehicles and vessels registered to
 7 him at that address, dating back to at least 2007.

8 38. Earlier this month, I learned from deputies at the Clallam County Sheriff's
 9 Office that they were conducting an investigation into HUNTER CHRISTOPHER
 10 BURROWS for unlawful possession of a firearm. Deputy James Dixon learned from a
 11 review of pawn shop records that HUNTER CHRISTOPHER BURROWS had pawned a
 12 Remington Arms .22 caliber rifle on September 5, 2020, at EZ Pawn in Clallam County,
 13 Washington. Deputy Dixon contacted the pawn shop and spoke with the owner. The
 14 owner told him that he knew HUNTER CHRISTOPHER BURROWS by sight as he is a
 15 frequent customer. The owner provided Deputy Dixon access to surveillance video
 16 showing the September 5, 2020, transaction. Deputy Dixon reviewed the video and saw
 17 that it depicted a man wearing a Seahawks jersey and a face covering enter the store
 18 carrying two rifles. The man came from a newer white Chevrolet crew-cab pickup truck,
 19 consistent in appearance with a 2015 Chevrolet Silverado like the SUBJECT VEHICLE.

20 39. Deputy Dixon also spoke with the EZ Pawn clerk who conducted the
 21 September 5, 2020, transaction with HUNTER CHRISTOPHER BURROWS. The clerk
 22 said he knew HUNTER CHRISTOPHER BURROWS and remembered the September 5,
 23 2020, transaction. He said that on that date, HUNTER CHRISTOPHER BURROWS
 24 came into the store with a Remington long run and an AK-style rifle, as well as two or
 25 three magazines; he was looking to obtain a loan against the items. The clerk evaluated
 26 the rifles and made an offer to HUNTER CHRISTOPHER BURROWS. He said
 27 HUNTER CHRISTOPHER BURROWS declined the offer on the AK but did get a loan
 28 on the Remington. The clerk explained that HUNTER CHRISTOPHER BURROWS had

1 ninety days from the date of the loan to pay the loan and interest, or the Remington would
2 default to the pawn shop, which would then sell it. The clerk also said that although he
3 has no recollection of HUNTER CHRISTOPHER BURROWS attempting to purchase
4 firearms at the store, he had purchased some optics for firearms. The clerk reviewed the
5 surveillance video provided by the owner for the September 5, 2020, transaction, and
6 confirmed to Deputy Dixon that it depicted HUNTER CHRISTOPHER BURROWS.

7 **CONCLUSION**

8 40. Based on the foregoing, I submit there is probable cause to believe that
9 contained within the locations described in Attachment A there exists evidence, fruits,
10 and instrumentalities, as described in Attachment B, of violations of 18 U.S.C. §§
11 922(a)(6) and (g)(1), (8) committed by HUNTER CHRISTOPHER BURROWS.

12 41. Based on the foregoing, I respectfully request that the Court issue the
13 proposed search warrant.

14 

15 Nathan Petrulak, Affiant
16 Special Agent, ATF

17 The above-named agent provided a sworn statement to the truth of the foregoing
18 affidavit by telephone on the 29th day of October, 2020.
19

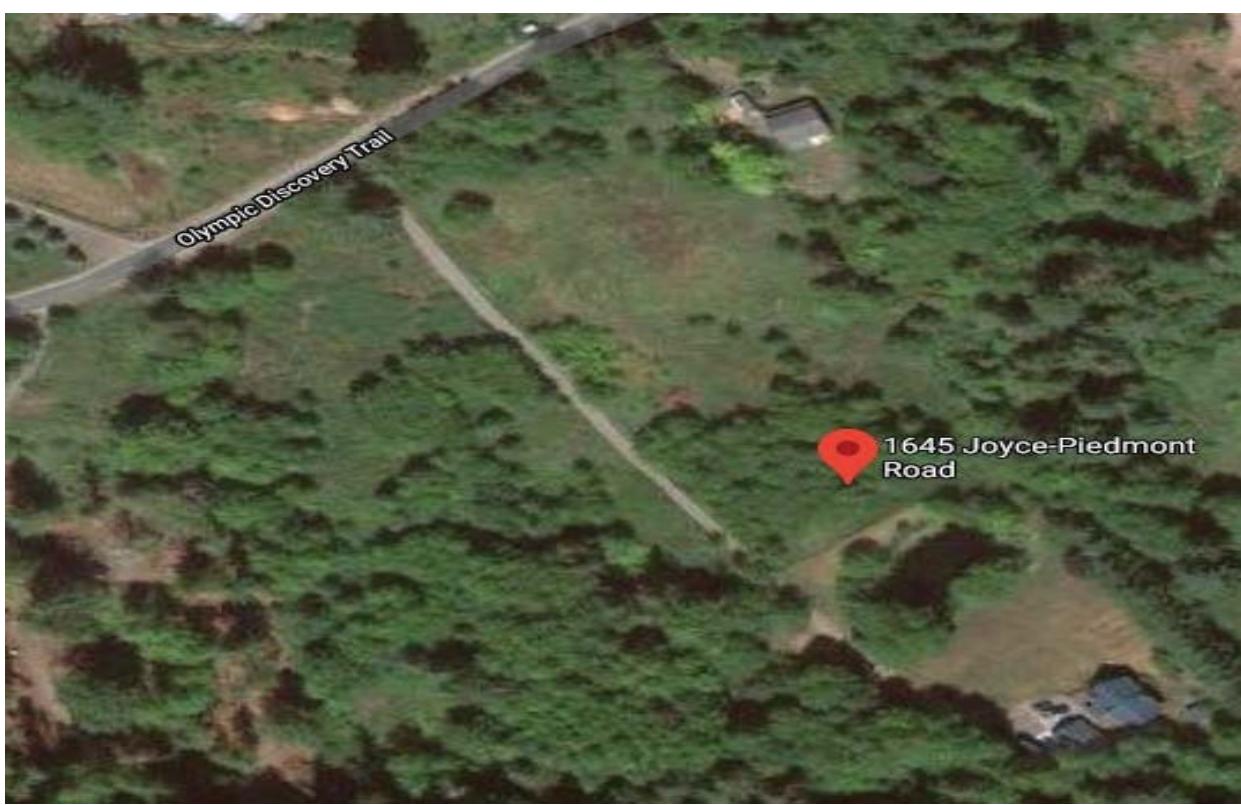
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21 J. Richard Creatura
22 United States Magistrate Judge
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1 **ATTACHMENT A**
2 **Location to Be Searched**
3

4 1. The SUBJECT LOCATION, a single family dwelling located at 1645
5 Joyce-Piedmont Road, Port Angeles, Washington, where items described in Attachment
6 B could be found, including HUNTER CHRISTOPHER BURROWS. The SUBJECT
7 LOCATION is a three-story residence which sits approximately 500 feet off of Olympic
8 Discovery Trail Road on a 4.86 acre lot. The house is a tan wooden panel home with a
9 green metal roof and eight large windows that face the driveway. Adjacent to the house is
10 a matching detached two-car garage.

11 Below are photographs from public records of the SUBJECT LOCATION:





ATTACHMENT A - 2
USAO No. 2020R00751

UNITED STATES ATTORNEY
700 STEWART STREET, SUITE 5220
SEATTLE, WASHINGTON 98101
(206) 553-7970

1 2. All closed or locked containers or safes within the residence located at 1645
2 Joyce-Piedmont Road, Port Angeles, Washington, where items described in Attachment
3 B could be found, including HUNTER CHRISTOPHER BURROWS.

4 3. All outbuildings, storage units, garages, and other structures located on the
5 property at 1645 Joyce-Piedmont Road, Port Angeles, Washington, whether locked or
6 unlocked, where items described in Attachment B could be found, including HUNTER
7 CHRISTOPHER BURROWS.

8 4. The SUBJECT VEHICLE: a white 2015 Chevy Silverado bearing
9 Washington State license plate C10284R, and having VIN GC4K0E81FF589043, where
10 items described in Attachment B could be found, including HUNTER CHRISTOPHER
11 BURROWS.

ATTACHMENT B

Items to Be Seized

For the places to be searched listed in Attachment A of this warrant, the government is authorized to search for and seize the following items, which are evidence and/or fruits of the commission of the following crimes: *Felon in Possession of Firearms and/or Ammunition*, in violation of Title 18, United States Code, Section 922(g)(1), and/or *Aiding and Abetting Making a False Statement in Connection with the Acquisition of a Firearm*, in violation of Title 18, United States Code, Section 922(a)(6):

1. Firearms, parts thereof, and ammunition that are evidence of the above-listed crimes;

2. Firearm-related items, including but not limited to firearms magazines, firearms accessories, holsters, gun cases, pistol grips, cleaning equipment, firearms safes or other storage devices, firearms manuals, records of the purchase of firearms, or other items related to the ownership or use of firearms;

3. Documents such as ledgers, receipts, notes, owner's manuals, invoices, packaging labels, Firearms Transaction Records (ATF Form 4473s), and similar items relating to the acquisition, possession, or transfer of firearms or firearm-related items;

4. Photographs, video tapes, digital cameras, and similar items depicting the acquisition, possession, or transfer of firearms, ammunition, firearm parts, or firearm accessories;

5. Cell phones and other communications devices (if such cell phones or other communications devices are seized, the government will seek further authorization from the Court before searching their contents);

6. Indicia of occupancy, residency, and/or ownership of the premises at 1645 Joyce Piedmont Road, Port Angeles, Washington (the SUBJECT LOCATION), and the 2015 Chevy Silverado (the SUBJECT VEHICLE), as described in Attachment A, including but not limited to rental records or payment receipts, deeds, escrow documents, mortgage statements, vehicle registration and bill of sale, and other documents or items

1 that tend to show the purchase, ownership, rental, or control of the SUBJECT
2 LOCATION and/or SUBJECT VEHICLE;

3 7. Items of personal property that tend to identify the person(s) in residence,
4 occupancy, control, or ownership of the SUBJECT LOCATION and/or SUBJECT
5 VEHICLE, including but not limited to canceled mail, deeds, leases, rental agreements,
6 photographs, personal telephone books, diaries, utility and telephone bills, statements,
7 identification documents, and keys; and

8 8. The person of HUNTER CHRISTOPHER BURROWS.

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